

PREPARING FOR AN AIR INSPECTION

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Today's Overview

- Pre-Inspection Activities
- Inspection Guide
- Inspection Day
- Inspection Feedback/Follow Up



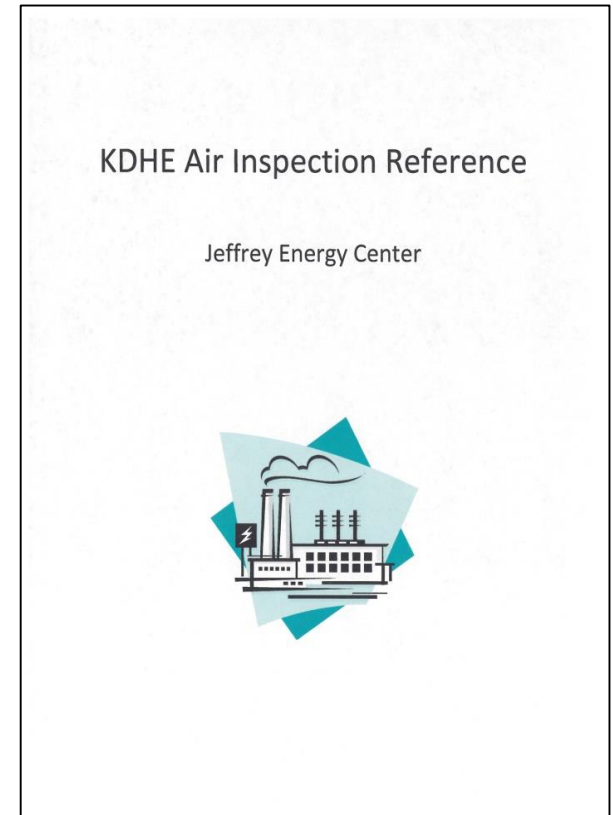
Pre-Inspection Activities

- Communication – frequent interaction with facility/facility personnel
- Inspection Protocol
 - Who to notify when an inspector shows up at the front gate?
 - Team to accompany inspector onsite
- Periodic Compliance Review
 - Physical and Electronic
 - Paper files
 - Corporate server
 - Corporate maintenance system
 - Environmental Compliance Software
 - Compliance checklist



Inspection Guide

- Westar Air Inspection Reference Guide
 - Contains pertinent facility specific inspection information
 - Includes common records
 - Current Class I Semi-annual Report
 - Current Class I Annual Certification
 - Construction Permits
 - Class I (Title V) Permit
 - RICE MACT and NSPS Summaries
 - Most recent Annual Emission Inventory
 - Compliance Assurance Monitoring (CAM) Plans
- Physical or Electronic Files
 - Maintenance logs, hours of operation, etc.
 - Stack test reports



OpsAir Record Example

SUMMARY REPORT

Owner/Operator: Westar Energy
 Facility: Jeffrey Energy Center
 KS Source ID No. 1490001
 Data Period: January 01, 2013 through January 01, 2014
 Date: January 27, 2014
 From the Opacity Limitations and Monitoring section of the Operating Permit

EMERGEN01, EMERGEN02, EMERGEN03, FIREPUMP01, and FIREPUMP02 are subject to the following opacity limitation:

Opacity shall not exceed 20 percent except as provided in K.A.R. 28-19-9, 28-19-11, or 28-19-650(c). [K.A.R. 28-19-650(a)(3)]

Emergency generators or other emergency equipment firing liquid fossil fuel, provided they meet the definition of emergency equipment as defined by the USEPA emergency generator policy dated September 6, 1995, are not subject to routine periodic monitoring requirements. Instead, the facility shall record the hours of operation and provided the hours of operation are less than or equal to 500 hours on a 12-month rolling average basis, no further monitoring or recordkeeping is required. In the event the emergency generators are operated in excess of 500 hours on a 12-month rolling basis, the facility will follow the routine periodic monitoring requirements outlined in its Title V permit until such time as the 12-month rolling average hours of operation are less than or equal to 500 hours.

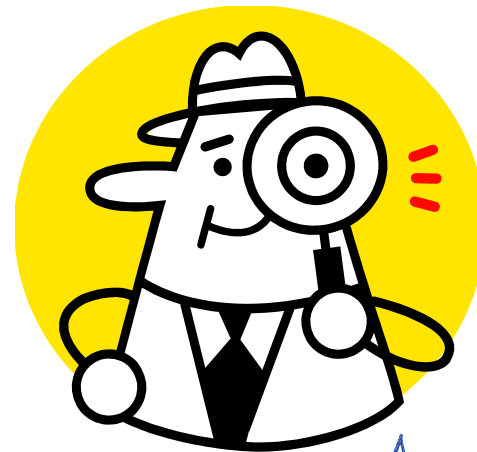
Following is a summary of the hours of operation of the emission units. As noted in the table, each emission unit operated less than 500 hours per year, therefore, no opacity assessments were required during this semi-annual reporting period.

Hours of Operation			
Timeframe	Hours of Operation, 12-month rolling average	Hours Required for Routine Periodic Opacity Monitoring	Periodic Opacity Monitoring Required?
EMERGEN01			
2/1/12 - 1/31/13	8	500	No
3/1/12 - 2/28/13	8	500	No
4/1/12 - 3/31/13	8	500	No
5/1/12 - 4/30/13	8	500	No
6/1/12 - 5/31/13	9	500	No
7/1/12 - 6/30/13	8	500	No
8/1/12 - 7/31/13	5	500	No

C:\Users\OPSADMIN\AppData\Local\Temp\JEC_SAMR_Emer_Hours {38CBB5AF-97D2-474A-BE00-2A590DD07770}.rpt

Inspection Day

- Inspector arrives onsite
 - Unannounced
- Inspection Day Protocol is initiated
 - Facility contacts corporate/onsite environmental coordinator
 - Facility personnel may accompany while awaiting appropriate company person
 - Facility offers PPE to inspector if needed
- Let the inspector dictate what he or she wishes to observe, review, etc.
- Records review
- Facility tour
 - May take a visual opacity observation
 - Continuous emission monitors
- May visit with plant management
- Sit-down/recap – Any compliance issues???



Inspection Feedback/Follow-Up

- Inspector may provide verbal feedback at the end of the inspection
- Typically Inspector will provide company with follow-up letter
 - Identifies any non-compliance issues
- Take corrective actions if deficiencies are noted



Take Aways

- Continuously prepare for an Inspection
- Insure ongoing compliance
- Get to know the facility/facility personnel
- Maintain complete and orderly records
- Determine who from your company will take the lead interfacing with the Insp
- Follow-up on any noted deficiencies



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